



Overview of Federal Program Monitoring

New Local Educational Agency
Coordinators and Direct-Funded
Charter Schools

Federal Program Monitoring Office

August 2014



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State Superintendent
of Public Instruction

Objectives

- Understand the Federal Programs Monitoring (FPM) review process
- Know the roles and responsibilities of each key participant in the process
- Be prepared to have a successful FPM review



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Agenda

- Purpose of FPM
- Federal/Categorical Programs to be Reviewed in 2014–15
- Compliance Monitoring Web Page
- California Accountability Improvement System (CAIS)
- Types of FPM Reviews
 - On-site Reviews
 - Online Reviews
- Sources of Evidence



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Agenda (Cont.)

- Key Roles in the FPM Process
- Different Types of Schedules
- Notification of Findings (NOF)
- Resolving Findings
- Requesting a Resolution Agreement



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Agenda (Cont.)

- Examples of Recent Findings
- Suggestions, Key Focus Areas, and Tips for New Coordinators
- Maintaining Compliant Programs
- 2013–14 Frequent Findings
- Questions
- Additional Resources



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Purpose of FPM

Purpose: to verify that programs funded by federal sources meet specified legal requirements

This is determined by fulfilling all items contained in program instruments. Note: FPM addresses compliance and program effectiveness.



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Definition of Terms

- **FPM:** the process that the California Department of Education (CDE) uses to monitor federal programs, although some state programs are also monitored
- **Program instruments:** the official, written tools that contains the legal requirements being monitored for a particular program
 - Each program has a separate **instrument**, based on the statutory requirements of that program



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Definition of Terms (Cont.)

- Program instruments are divided into **items**, which are individual components of the requirements
- A few items are the same in more than one instrument



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2014–15

Participating Programs

- Adult Education
- Before and After School Programs
- Career Tech Education
- Compensatory Education
- Early Education Services
- Education Equity
- English Learner

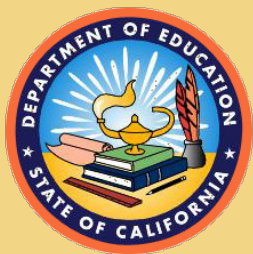


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2014–15

Participating Programs (Cont.)

- Fiscal Monitoring
- Homeless Education
- Improving Teacher Quality
- Migrant Education
- Neglected or Delinquent
- Physical Education
- Uniform Complaint Procedures



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Compliance Monitoring Web Page

<http://www.cde.ca.gov/ta/cr>



California Department of
EDUCATION

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Compliance Monitoring

Schools, districts, and county offices that receive funding for certain programs may be chosen for a review by the state. The purpose of the review is to ensure that they are spending the funding as required by law. Reviews may take place in person and/or through an online process.

At the end of each review, the state will complete a report of findings informs the school, district, or county office how to correct the findings.

The California Department of Education works to provide a simplified and streamlined monitoring through this process.

- For more information about parental involvement in categorical programs, you may visit the [Title I, Part A Parent/Family Involvement Web page](#), [District-level English Learner Advisory Committee Web page](#), or the [School English Learner Advisory Committee Web page](#).
- The information below was developed for educators and others who work with the monitoring process in California.

[Compliance Monitoring Home](#) | [General Information](#) | [Reviews](#) | [Program Instruments](#) | [CAIS Correspondence](#) | [Contact Information](#) | [Additional Federal and State Monitoring](#)



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Compliance Monitoring Web Page (Cont.)

- 2014–15 Program Instruments (Coming Soon)
- CAIS link and CAIS County Leads
- Resolution Process
- FPM Review Schedule
- FPM Training Resources



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Definition of Terms

- **Local educational agency (LEA)** is a generic term that applies to local school districts, county offices of education and direct-funded charter schools



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Direct-Funded Charters

- Direct-funded charter schools serve as their own LEA
- Not all program instrument items may apply to direct-funded charter schools



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CAIS

California Accountability & Improvement System

- **CAIS** is the electronic system used in the FPM process to receive, review and comment on documentation for each program being reviewed
- It is also used to develop and store LEA Plans, Title III Accountability Plans, and Single Plan for Student Achievement (SPSAs)



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The default school year has been changed from 2013-14 to 2014-15. LEAs working in 2013-14 and previous years continue to have access through the school year drop-down menu. Instructions for accessing prior school years is located in the Help menu which is located in the upper right corner of all CAIS pages.



California Accountability & Improvement System

Hi Shireen! [Logout](#) [Help](#)

LEAs

Current LEA:
Ventura County Office of Education - 56105610000000

[Setup & Maintenance](#)

LEA Overview

Monitoring

LEA File Cabinet

Plan Tags

[Home](#) > [Ventura County Office of Education - 56105610000000](#)



LEA OVERVIEW



Ventura County Office of Education - 56105610000000

Select School Year:

2014-15 School Year

[Update](#)

☒ Monitoring Instruments (7)

Page size: 25 1 to 7 of 7 items			
Name	Status	Items not in Compliance	Due Date
Compensatory Education 2014-15 (CE)	In Progress	0	
Education Equity 2014-15 (EE)	In Progress	0	
English Learner On-site 2014-15 (EL)	In Progress	0	
Fiscal Monitoring 2014-15 (FM)	In Progress	0	
Migrant Education On-Site 2014-15 (ME)	In Progress	0	
Neglected or Delinquent 2014-15 (NorD)	In Progress	0	
Uniform Complaint Procedures 2014-15 (UCP)	In Progress	0	
Page size: 25 1 to 7 of 7 items			

REVIEW INFORMATION

[Ventura County Office of Education](#) 09/29/2014 - 10/01/2014
[Schedule Review](#)



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Definition of Terms

- **On-site:** reviews during which a team of CDE personnel visit your LEA. They review documents and, while on site, observe classrooms and interview staff and parents. For 2014–15, Cycle A is on-site.
- **Online:** FPM reviews that take place entirely through CAIS. For 2014–15, Cycle C is online.



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Definition of Terms (Cont.)

- **Common Site:** a site where the majority of the on-site team is participating in the review. Usually involves at least Compensatory Ed and English Learner programs.
- **Alternate Site:** a site where only one program participates during an on-site review



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Definition of Terms (Cont.)

- **Evidence:** the sources used to determine whether the LEA is meeting legal requirements for a given program
- **Findings:** the determination by a CDE reviewer that a program instrument item(s) does not meet legal requirements



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On-site Reviews Cycle A LEAs

- All LEAs divided into 4 cycles; A-D
- Number of days/sites vary by size of LEA
- Number of programs reviewed vary
- Usually one site visited per day
- May involve a simultaneous online review for certain programs



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On-site Reviews

Cycle A LEAs (Cont.)

- Daily schedule follows template and is developed in cooperation with LEA
- Daily debriefings (no surprises)
- LEA given opportunity to request clarification on preliminary findings
- Exit meeting at end of review



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Online Reviews Cycle C LEAs

- Findings determined on the basis of documentation only
- Some programs test only certain program instrument items—not full instrument
- Communications between CDE and LEA captured in CAIS



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Online Reviews

Cycle C LEAs (Cont.)

- Effective two-way communication is even more critical with an online review
- Online reviewers debrief daily with LEA in CAIS and as needed by phone or e-mail
- Same opportunity for LEA to seek clarification of findings



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Three Principal Sources of Evidence

- **Documentation:**

Ex: Meeting minutes, agendas, Single Plan for Student Achievement (SPSA), fiscal records, policies, LEA Plans /Addenda

On-site only

- **Interviews:**

Ex: School Site Council (SSC) , advisory committee members, categorically-funded staff

- **Classroom/Program Observations**



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Definition of Terms

- **LEA Review Coordinator:** The person assigned to coordinate the review. This person is the primary contact between the LEA and CDE.
- **Regional Team Leader (RTL):** The CDE staff person responsible for planning, scheduling, coordinating, and monitoring the progress of the review.



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Definition of Terms (Cont.)

- **Program Reviewers:** CDE staff that are experts in a particular program. They have been trained in the program requirements and have been assigned a program instrument to be completed during the review.



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Definition of Terms (Cont.)

- **LEA Program staff:** Depending on the size of the LEA, there may be personnel designated to represent the different programs at the LEA. In small LEAs, one person may represent many programs.
- **Fiscal staff:** Staff in the LEA that handle the budget and accounting functions for the programs being reviewed.



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LEA Review Coordinator

- Primary LEA contact for the FPM Review
- Monitors progress of the FPM on the LEA side
- Ensures effective communication between LEA and CDE staff
- Meets with FPM team to debrief daily
- Ensures prompt follow-up to reviewer comments



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Regional Team Leader

- Serves as liaison between LEA and CDE
- Facilitates the FPM process before, during and after a review
- Ensures FPM review is conducted consistently with FPM policies and procedures
- Promotes transparency—a policy of “no surprises” and monitors review



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Regional Team Leader (Cont.)

- Facilitates entrance meeting, exit meeting and scheduled interviews
- Communicates with program reviewers at alternate sites and those conducting online reviews, facilitates communication between reviewers and LEA, ensuring that LEA requests for clarification are addressed



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Program Reviewer

- Works closely with LEA program counterpart
- Provides **compliance** assistance as necessary
 - Compliance vs. Technical Assistance
- Responds to any questions or concerns raised by LEA



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Sample Daily Schedules for On-Site Reviews (Cycle A)



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District Level Review

- Begins with District Entrance Meeting
- Continuation of the online review for district-level items
- Usually involves a review of district policies and procedures, and district-level expenditures



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XXXXXXX School District
Federal Program Monitoring Review
On-site Daily Schedule
Date:
District Office: Address and Phone Number
LEA Review Coordinator:
Participating Programs: BASP, CD, CE, EL, ME, PE, UCP (online)

Time	Activity	Location/Personnel/ Other Instructions
12:30 p.m.	Preliminary FPM Team Meeting <ul style="list-style-type: none"> On-site team meeting 	District Office <ul style="list-style-type: none"> CDE team members
1 p.m.	District Entrance Meeting <ul style="list-style-type: none"> CDE and LEA introductions RTL opening comments Brief LEA comments (e.g., demographics, performance profiles, district challenges, other salient information) Finalize or adjust the schedule and logistics 	District Office <ul style="list-style-type: none"> CDE team members Selected LEA staff
1:30 p.m.	District Review <ul style="list-style-type: none"> Interviews with district program personnel Interview designated advisory committee members 	District Office <ul style="list-style-type: none"> CDE team members LEA program administrators
4:30 p.m.	Debriefing <ul style="list-style-type: none"> CDE team members will debrief individually with LEA program counterparts 	District Office
Notes:		
<ul style="list-style-type: none"> Team may need technical assistance to access the internet. 		



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Site Visit

- Follow-up of review of documents submitted in CAIS related to specific sites on schedule
- Review confidential student data, observations and interviews, and review of other data as necessary



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XXXXXXX School District On-site Daily Schedule

Date:

School Site Name, Address and Phone Number

Participating Programs: CE, EL, ME, BASP*, PE, UCP (online)

Time	Activity	Location/Personnel/ Other Instructions
8:30 a.m.	Site Entrance Meeting <ul style="list-style-type: none"> • Introductions • Brief school comments (e.g., demographics, performance profiles, other salient information) • Schedule and logistics 	School Site <ul style="list-style-type: none"> • CDE team members • Principal and selected staff • LEA Review Coordinator and program staff
9 a.m.	Interviews (30 minutes per group) with program staff <ul style="list-style-type: none"> • 9 a.m. – Certificated staff funded with categorical funds • 9:30 a.m. – Classified staff funded with categorical funds Observation of instructional settings Review student confidential records	School Site <ul style="list-style-type: none"> • CDE team members • **Personnel funded through programs being reviewed <ul style="list-style-type: none"> ○ Teachers ○ Paraprofessionals ○ Other staff paid with categorical funds
	Lunch (may be working lunch with team)	



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School site visit (Cont.)

1 p.m.	<p>Interview council and committee members, as applicable:</p> <p>1 p.m. School Site Council Members 1:30 p.m. Advisory Committee Members</p> <p>Note: These meetings should be scheduled at a time when teachers, staff, and parents on SSC can attend.</p>	<p>School Site</p> <ul style="list-style-type: none"> CDE team members SSC meetings must not include students Advisory committee members
2 p.m.	Complete interviews, observations, and review of student records	<p>School Site</p> <ul style="list-style-type: none"> CDE team members
3 p.m.	CDE Team Debriefing Meeting	<p>School Site</p> <ul style="list-style-type: none"> CDE team members
3:30 p.m.	<p>School Site Debriefing</p> <ul style="list-style-type: none"> CDE team members report on findings with principal and district/school leadership 	School Site
5 p.m. (Day before Exit Meeting)	Final Deadline for uploading documents in CAIS	<ul style="list-style-type: none"> LEA Review Coordinator
8 p.m. (Day before Exit Meeting)	Deadline for Program Reviewers to complete writing of preliminary findings in CAIS	<ul style="list-style-type: none"> CDE team members
<p>Notes: Team may need assistance with access to the internet.</p> <p>* BASP team member may enter 90 minutes before regular classes begin if site has a before school program and between the end of the regular day and 6 p.m. for after school programs.</p> <p>** Staff funded in whole or in part from categorical funds for programs being reviewed at site.</p>		



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District Exit: Presentation of Findings

- LEA given opportunity to review preliminary findings
- LEA may request a District Meeting to provide clarification
- NOF is presented at Exit Meeting



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XXXXXXXX School District Federal Program Monitoring Review On-site Daily Schedule

Date:
District Office: Address and Phone Number

Time	Activity	Location/Personnel/ Other Instructions
8:30 a.m.	CDE Team Meeting <ul style="list-style-type: none"> Finalize preliminary findings 	District Office <ul style="list-style-type: none"> CDE team members
10 a.m.	District Meeting <ul style="list-style-type: none"> The CDE team meets with LEA personnel to respond to clarifying questions or concerns with preliminary findings 	District Office <ul style="list-style-type: none"> CDE team members Selected LEA staff
10:30 a.m.	District Exit Meeting <ul style="list-style-type: none"> NOF Discuss resolution process 	District Office <ul style="list-style-type: none"> RTL
Notes: Preliminary Findings will be presented to the LEA by 9 a.m. RTL will need access to a printer and copier for the Notification of Findings.		



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Online Reviews

- Some programs test only a subset of program instrument items during the on-line review, not the full instrument
- Conducted entirely through CAIS
- No interviews or observations
- Results depend solely upon LEA documentation



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Online Reviews (Cont.)

- All exchanges must be documented in CAIS
- Review includes daily debriefings of the status of each instrument in CAIS
- On the day of the exit, LEA has the opportunity to request a conference call to clarify findings



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Sample Daily Schedules for Online Reviews (Cycle C)



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Online Review Entrance and Subsequent Days

- District and selected sites are reviewed each day
- The process continues, per schedule, until the upload deadline at 1 p.m. on the day prior to the exit



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XXXXXXX School District
Federal Program Monitoring Review
Online Daily Schedule
Day 1 of the Review and each subsequent day
LEA Review Coordinator:
Regional Team Leader:
Participating Programs: BASP, CE, EL, ME, PE, UCP

Time	Activity	Personnel
9 a.m.	<ul style="list-style-type: none"> The LEA Review Coordinator is notified that the FPM review is in progress. 	<ul style="list-style-type: none"> Regional Team Leader
Throughout each day of the review	<ul style="list-style-type: none"> Interaction in CAIS continues between program reviewers and the LEA program counterparts. 	<ul style="list-style-type: none"> Program Reviewers Selected LEA program counterparts
4 p.m.	<ul style="list-style-type: none"> Program reviewers debrief with LEA program counterparts by posting a CAIS comment regarding any program instrument item not meeting legal requirements as of today. 	<ul style="list-style-type: none"> Program Reviewers
Notes: <ul style="list-style-type: none"> The LEA can continue to upload additional documents until 1 p.m. on the day before the exit. 		



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Exit:

Presentation of Findings



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XXXXXXXX School District
Federal Program Monitoring Review
Online Daily Schedule
LEA Review Coordinator and Contact Number:
Regional Team Leader and Contact Number

(Date) EXIT

Time	Activity	Personnel
9 a.m.	<ul style="list-style-type: none">• Deadline for RTL to send the Preliminary Findings to the LEA	<ul style="list-style-type: none">• Regional Team Leader
10 a.m.	<ul style="list-style-type: none">• Deadline for LEA to request a conference call to clarify Preliminary Findings	<ul style="list-style-type: none">• Regional Team Leader• LEA Review Coordinator
11 a.m.	<ul style="list-style-type: none">• Conference call with LEA (scheduled upon request by the LEA).	<ul style="list-style-type: none">• Regional Team Leader• Select Program Reviewers• Select LEA program counterparts
noon	<ul style="list-style-type: none">• Final NOF distributed to the LEA and uploaded into CAIS	<ul style="list-style-type: none">• Regional Team Leader• FPM Office Staff
1 p.m.	<ul style="list-style-type: none">• RTL contacts the LEA to discuss the resolution of findings process	<ul style="list-style-type: none">• Regional Team Leader



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Notification of Findings (NOF)

- The NOF is the official report that delineates the findings (if any) at the end of the FPM review. This is a legal document and is stored in CAIS.



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**Federal Program Monitoring
Notification of Findings**

County/District Code:		LEA Name:	
County:		Review Dates: 12/05/2011 - 12/09/2011	
FPM Region: Region 08			
FPM Coordinator: Diane Wallace		Telephone:	E-mail: wallaced@bcsd.com
Regional Team Leader: Ted Hawthorne		Telephone: 916-319-0321	E-mail: thawthorne@cde.ca.gov

Program Reviewed	Program Reviewer
Physical Education-Cycle B (PE)	Bob Calvo Doug Jann
Uniform Complaint Procedures-Cycle B (UCP)	Shanine Coats Sally Lewis Arturo Vasquez
State Fiscal Stabilization Fund-Cycle B (SFSF)	Paula Flores Oluwole Olukoya
Child Development-Cycle B (CD)	Mitzi Inouye Sandy Patitucci
Before and After School Programs - Cycle B (BASP)	Corlene Goi
Fiscal Monitoring-Cycle B (FM)	Paula Flores Oluwole Olukoya
English Learner-Cycle B (EL)	Sonia Petrozello
Education Jobs Fund - Cycle B (EJF)	Paula Flores Oluwole Olukoya
Improving Teacher Quality-Cycle B (ITQ)	Geeta Rezvani
Compensatory Education-Cycle B (CE)	Keith Coppage
Migrant Education-Cycle B (ME)	Frank Uribe

This is the official Notification of Findings (NOF) report of the review visit conducted by the California Department of Education (CDE). Because the methodology of the review involves sampling, it is not an assessment of all legal requirements. Nevertheless, the local educational agency (LEA) is responsible for operating its federal categorical programs in compliance with all applicable laws and regulations.

The LEA is required to resolve each Federal Program Monitoring (FPM) finding within 45 calendar days which ends on 01/23/2012. When a FPM finding cannot be resolved within this 45 calendar day period, the LEA submits a resolution agreement request using the "Proposed Resolution of Findings" process via CAIS. Authorized LEA staff may request suggestions from CDE staff on the resolution of findings.

NOTE: Copies of this report were distributed to the LEA. This is a public report and must be made available upon request. (California Public Records Act, Government Code section 6250)

FOR OFFICIAL CDE USE ONLY:

California Department of Education

Federal Program Monitoring
Notification of Findings

County/District Code:			LEA Name:	
Program	Item Identifier	Item Title	Item Findings	Due Date
Before and After School Programs - Cycle B (BASP)	II-BASP 10	BASP Governance Inventory for Equipment	<p>Status: Does Not Meet Requirements</p> <p>The _____ School District (_____) is required to maintain an inventory that describes the acquisition of equipment that cost \$500 dollars or more by type, model, serial number, funding source, acquisition date as well as other items listed on the BASP FPM instrument for this item. The district is also required to submit evidence that a physical check of the inventory of equipment has been conducted within the past two years and that the result is reconciled with the inventory records.</p> <p>The _____ did not submit documents to provide evidence of compliance with the requirement to maintain an inventory for equipment with a cost of \$500 or more and that indicate that a physical check has been conducted within the past two years.</p> <p>The _____ must submit a copy of the inventory records for _____ Elementary School, _____ Elementary School, and _____ Middle School, and documentation to provide evidence that a physical check of the equipment has been conducted within the past two years to resolve this finding.</p>	01/23/2012
Before and After School Programs - Cycle B (BASP)	III-BASP 11	BASP Funding Direct Services to Pupils	<p>Status: Does Not Meet Requirements</p> <p>The _____ School District (_____) is required to allocate no less than 85 percent of the total grant amount to school sites for direct services to pupils. The _____ cannot spend more than 15 percent of the amount of the grant for administrative costs, which includes any indirect costs.</p> <p>The _____ did not submit documents to provide evidence of compliance with the requirement to spend 85 percent of the total grant amount on direct services to pupils and information that indicates that no more than 15 percent of the amount of the grant has been spent for administrative costs, which includes any indirect costs.</p>	01/23/2012



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Examples of Recent Findings

- Personnel Activity Reports (PARS) reflect budgeted rather than actual hours
- Time records do not show activities funded through categorical funds
- Job descriptions do not provide sufficient evidence that staff who are funded with categorical funds are providing services to students aligned to the funding requirements



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Importance of Duty Statements

- Duty Statements vs. Job Descriptions
 - Job descriptions are general
 - Duty statements apply to a specific position and are used to document:
 - Time and effort; and,
 - Primary duties
 - Duty statements allow LEA to show alignment of duties to funding source(s) and assign percentages



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Examples of Recent Findings

- Food purchases and other items not “reasonable and necessary”
- SPSAs do not reflect final allocations to sites
- Required school-wide plan elements not addressed (See Schoolwide Program Web page at <http://www.cde.ca.gov/sp/sw/rt/>)



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Organizing for a Successful FPM Review



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Preparing for the Review

- Seek district commitment to the review timelines and workload
- Familiarize yourself with program instruments



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Preparing for the Review (Cont.)

- Review existing district systems, policies and procedures
- Involve multiple stakeholders early including fiscal staff
- Train staff on program instruments



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Preparing for the Review (Cont.)

- Do not assign yourself as the only submitter for all instruments
- Identify and assign key individuals to assist you on each program instrument (district/site/both)
- Focus early on documents that require more time to modify



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Preparing for the Review (Cont.)

- Seek communication opportunities with FPM team members to provide you with additional clarification, when needed



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Uploading and Document Review Period

- Upload early, if possible, but by all means meet the 30 day upload deadline to give reviewers enough time to look thoughtfully at your documentation



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Uploading and Document Review Period (Cont.)

- Post comments in CAIS if you do not receive timely comments
- Insist on specific feedback from reviewers
- Ask reviewers to specifically identify the gaps in your documentation



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During the Review

- Have fiscal staff on call
- Schedule School Site Council and key advisory committee meetings during review dates
- Attend all debriefing sessions and take detailed notes
- LEA Review Coordinator must closely monitor all exchanges in CAIS for each instrument



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During the Review (Cont.)

- Anticipate that you and your staff may be required to upload documents throughout the day
- Block out your schedule for the review dates along with that of other key district and site staff



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Definition of Terms

- **Resolution of Findings:** The correction of any items not meeting statutory requirements identified in the NOF
- **Resolution Agreement:** An agreement that extends the time the LEA has to correct any findings beyond the 45 day period up to a maximum of 225 days



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Resolving a Finding

- Review the wording of the finding to determine evidence required to resolve item
- Upload evidence to the item
- Change item status to “Resubmitted for Review”
- Post comment in CAIS notifying reviewer of new documentation



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Resolving a Finding (Cont.)

- Respond as necessary to reviewer comments
- LEA is required to resolve each finding within **45 calendar** days following the review
- If the LEA cannot resolve a finding within this time frame, **the LEA** may request a Resolution Agreement.



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Requesting a Resolution Agreement

- Posted in CAIS at the item level
- Change status of item to “Resolution Agreement Requested”
- Agreement cannot extend beyond 225 calendar days after the end of the review



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Requesting a Resolution Agreement (Cont.)

- Indicate steps to be taken and proposed resolution due date
- The CDE program reviewer will grant or deny the request
- Reviewer determines the length of time and enters date in CAIS



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Maintaining Compliant Programs

- FPM should not be an event: it is an on-going process
- Implement **systems** that will allow you to maintain the required evidence
- Systems become a form of on-going professional development and assure continuity



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Tips for New LEA Coordinators

- Learn how to use CAIS
- Delegate the physical uploading of documents
- Attend all available trainings
- Find a mentor



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State Superintendent
of Public Instruction

Most Frequent Findings from 2013–14 Review Cycle



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Questions



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Additional Resources and Contact Information

CDE

- Program reviewers
- Regional Team Leader

County Offices of Education

- CAIS County Lead (See CAIS
County Lead Web page

<http://www.cde.ca.gov/ta/cr/contact.asp>



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Additional Resources and Contact Information (Cont.)

Federal Program Monitoring Office
California Department of Education
916-319-0935
fpmoffice@cde.ca.gov
<http://www.cde.ca.gov/ta/cr/>